SPECIAL FAQ'S FOR U.S. EXPORT-IMPORT BANK ASSOCIATES REGARDING ASBESTOS ABATEMENT AT THE LAFAYETTE BUILDING 2/25/2011

GSA thanks everyone who attended our All-Hands meeting on "*Asbestos and Lead Abatement"* during the Lafayette Modernization project presentation on February 8, 2011. There were so many questions that we could not respond to them all at the presentation and committed to follow-up with answers to your questions. Since many answers must contain technical terminology, we have included a *Glossary of Terms* at the end of this document (*Appendix A*).

Almost all the questions were concerned with asbestos abatement. We hear your concerns and want to assure your health and safety is taken very seriously in our projects. GSA would not ask a tenant to remain in a building where we are removing asbestos if we could not commit to protecting your health and safety. Asbestos material removal is heavily regulated to include numerous safeguards all of which shall be adhered to during the Modernization project.

Asbestos is a naturally occurring mineral fiber that is commonly used in many applications both outside and inside buildings. Federal regulators such as the Occupational Safety and Health Administration (OSHA) and the Environmental Protection Agency (EPA), recognize this and scientifically set permissible exposure limits (PEL) for asbestos. These limits are an exposure level that statistically doesn't increase the likelihood of a health hazard. As stated above, even without asbestos in building materials this mineral fiber exists in the natural ambient air.

Regulations are written after lengthy consultation with many different parties who are concerned about the issues. Research, reviews, and many hearings are pursued until a consensus or reasonable majority opinion is reached as to what exposure limits can be allowed. Once the federal law or regulation is in place, GSA and other federal organizations must comply. GSA has developed our procedures and protocols to comply with the applicable laws and regulations that ensure our customer's safety.

As part of the ongoing operation of the building, GSA follows the EPA regulations to maintain and manage the asbestos building material in place. The regulations identify the need to perform inspections, create a management plan where materials are identified, and follow applicable guidelines when material is damaged and/or expected to be disturbed by work activity. The asbestos-containing materials found in the Lafayette building include certain types of Floor Tile and the underlying mastic; ceiling plaster and some types of tiles; acoustical finishes; mechanical equipment such as HVAC Duct Wrap and mastic; pipe insulation and elbows; fire doors; window caulk; and roofing materials. These materials have been inspected throughout the years to verify they are not damaged.

Fiber-In-Air (FIA) sampling has been conducted periodically to confirm that management and control methods are effective in keeping the fiber levels within EPA recommended occupancy limits of less than 0.01 fibers per cubic centimeter of air (<0.01 f/cc). Results from this sampling have consistently shown that asbestos fibers in excess of this limit are not being released into the building's occupied zones.

As projects progress in areas where the identified materials would potentially be disturbed, controls are put in place. These controls include a special National Institute of Building Sciences (NIBS) referenced

asbestos work practice for the day-to-day operations. For larger scale projects, an asbestos abatement specification (GSA Asbestos Abatement Specification Section 02085) is applied.

Prior to starting this modernization project, GSA re-assessed the building to identify what hazardous materials will be affected by the project and specific locations of the asbestos containing materials. FIA samples will be collected prior to construction to establish the baseline or norm. Inspections and sampling will take place during the construction to protect all building occupants. Finally, inspections and sampling will be performed after the construction is complete to verify the project has complied with the laws and regulations and everyone will continue to be safe. A list of the types of tests conducted to ensure safety is appended to this document (*Appendix B*).

For the removal of asbestos containing materials, the GSA Specification Section 02085 requires the use of only qualified contractors. The qualifications are based on EPA, District of Columbia, and OSHA regulations. Protocols require the contractor to submit an abatement plan demonstrating their qualifications and removal methods prior to start of construction. The construction abatement contractor, *LVI Services*, has submitted their plan which has been approved. Reviews and recommendations for approvals or rejections are conducted by GSA's independent Industrial Hygiene (IH) contractor, *Applied Environmental, Inc.* Final acceptance is the responsibility of GSA's Industrial Hygienists in NCR's Fire and Life Safety Branch.

Prior to the start of asbestos abatement, the work area will be isolated within a containment (a sealed work enclosure). The air within the containment is under constant negative air pressure, so no air escapes to areas outside the containment. The air inside the containment is filtered with High Efficiency Particulate Air (HEPA) filters, before being directly exhausted outside the building. All workers inside the containment are required to wear specialized clothing and respiratory protection equipment, and are required to shower before exiting the containment. All materials and equipment are also wet wiped, HEPA vacuumed, and bagged for disposal before leaving the containment. Finally, after asbestos abatement activities are completed and air testing shows no remaining asbestos contamination is present; the containment itself is cleaned and bagged. All waste water is filtered. Bagged waste materials are taken to licensed hazardous materials waste management sites.

The entire work process is monitored by an independent Industrial Hygiene (IH) firm who is empowered to shut the work down if any work activity is not performed properly or any hazardous incident occurs. In such cases, GSA's independent IH will require the contractor to take appropriate steps to secure the site and remedy the situation. If the situation is serious enough to endanger building occupants, the IH will order the building to be evacuated. Since the abatement activity will primarily be accomplished after normal working hours, all building tenants will be informed, by email or phone, that the building will be closed and when it will be safe to reopen.

More information on asbestos abatement in the Lafayette Modernization project is available in a fact sheet on the project website, at http://www.gsa.gov/ncrlafayette.

Additional questions or requests for information can be emailed to lafayette.modernization@gsa.gov

A glossary of terms can be found at the end of this document.

FAQ'S FROM GSA'S ASBESTOS ABATEMENT PRESENTATION
2/8/11

ASBESTOS ABATEMENT SCHEDULE:
Q1. When will abatement start?
A1. Abatement was scheduled to start in the Penthouse on February 21, 2011, pending final review and approval of the abatement submittal plans. We have deferred the start date to March 7, 2011 in order to share additional information requested by the tenants of the Lafayette Building. Notices will be posted as to specific dates for abatement.
Q2. Will a more defined work plan be established to show Ex-Im Bank exact schedules for abatement activities?
A2. Yes. The initial work start for abatement will be deferred so that more information can be provided. Notice of exact dates will be provided as they are confirmed. Notice of these confirmed dates will be sent to Ex-Im Bank as well as be posted on the digital monitors located in the Lafayette lobby and the project website.
REGULATORY COMPLIANCE:
Q3. Was an environmental impact statement (EIS) produced? If not, was a CATEX provided? If so, can Ex-Im Bank be provided a copy of the CATEX?
A3. The NEPA process was followed, resulting in a CATEX. We will provide the CATEX document to Ex-Im Bank and post the document to the project web site.
AIR QUALITY:
Q4. Will IAQ follow ups occur, post baseline IAQ survey?
A4. A baseline indoor air quality (IAQ) assessment was performed prior to construction start. The IAQ report, dated December 28, 2010, will be posted on the Lafayette Modernization website. Sampling for Total Volatile Organic Compounds (TVOC) and dust particulate will be performed daily during active construction. A pre-occupancy IAQ survey will be conducted prior to moving occupants into newly renovated space.
Q5. Will air samples be taken in the areas where Ex-Im Bank is working?
A5. Yes, air samples will be collected in adjacent occupied Ex–Im Bank spaces for asbestos and lead during abatement activity. In addition, air samples will be collected for TVOCs and dust particulate during non-abatement activities.
Q6. Will testing be in offices as well as in corridors?
A6. The baseline IAQ testing was performed primarily in offices and conference rooms. All additional sampling will be conducted in random but similar locations.
Q7. Will testing be more frequent than daily?
A7. Testing will be conducted continuously during any abatement work activity. For non-abatement general construction periods, Total Volatile Organic Compounds (TVOCs) and dust particulate sampling will be performed in the Ex-Im Bank occupied space.
Q8. When will daily samples be tested, especially when work is occurring at night?
A8. Samples are analyzed at the end of the work shift but prior to the abatement firm leaving the site.
Q9. What is a safe exposure level?
A9. The OSHA 8 hour time weighted average permissible exposure limit is 0.10 fibers/cubic centimeter of air (f/cc). The EPA 40 CFR 763 and Title 20 DCMR, Section 800 clearance level for asbestos

response actions is 0.01 f/cc or < 70 structures per square millimeter (s/mm2) for small and large scale abatement projects. GSA will be adhering to the EPA and DC Municipal Regulations (DCMR) clearance requirements.

Q10. Explain daily monitoring, what tolerances levels are used, and what documentation?

A10. Daily monitoring during asbestos and lead abatement activities includes:

A. Pre abatement activities:

1. Background air samples and inspection

B. During abatement activities:

1. Frequent inspections by industrial hygienist
2. Preparation of abatement checklist and daily work activity reports
3. Monitoring containments for negative pressure
4. Air Sampling inside and outside of abatement areas (to include adjacent occupied spaces)
5. On-site analysis of air samples
6. Issue daily report summarizing work activity and air sample results. Report posted on project web site.

C. Post abatement activities:

1. Final visual and air clearance testing. Final report summarizing inspections and air sample result issued.
2. Daily engineering control verification sampling during construction and non-abatement periods:
   a. Inspections by industrial hygienist
   b. Air Sampling to include total dust particulates and total volatile organic compounds

Air Sampling to include total dust particulates and total volatile organic compounds
Acceptable air sample level for asbestos is 0.01 fibers/cubic centimeter of air for areas outside the containment. The OSHA action level for acceptable lead outside the containment is 30 micrograms/liter of air.

The OSHA regulation exposure limit for particulates is 15 milligrams /cubic meter of air (mg/m3) and 5 mg/m3 for respirable particulate. A standard limit for exposure to TVOC's does not yet exist; however, an action level of 1.3 parts per million (ppm) is established for this project based on best available research. A daily report summarizing inspections and results will be issued and posted to the project website as well.

Q11. How close are the results of the sampling compared to the acceptable fiber standard?

A11. Per EPA recommendation as part of the overall asbestos management program in buildings with friable asbestos, GSA collects fiber-in-air (FIA) samples on an annual basis. GSA has FIA results for the Lafayette Building for years 2000 through 2010 showing fiber levels below the EPA and DCMR clearance requirements.

SAFETY CONTROLS:

Q12. Does GSA have any issue with Ex-Im Bank hiring third party agent to represent Ex-Im Bank during abatement activities?

A12. Ex-Im Bank is welcome to bring an independent environmental consultant to review the abatement plan and to be present during abatement activities.

Q13. Will a third party agent represent Ex-Im Bank, above and beyond GSA third party agent?

A13. Yes. Ex-Im Bank is in the process of hiring a Certified Industrial Hygiene firm to monitor the work and report back to Ex-Im Bank.

Q14. What measures are taken to ensure absolute safety during asbestos and lead abatement?

A14. The Modernization project is following the GSA standard guidelines for the safe removal of hazardous materials. Developed in the late 1980s, the GSA standard guidelines include strict compliance with local and national regulations, as well as the use of qualified contractors and a third party board certified industrial hygienist (CIH) to enforce all regulations.

The GSA standard guidelines require the Contractor to submit detailed work plans for review and approval by a CIH. The Modernization work plans were approved on February 11, 2011.

The CIH approval process confirms up to date worker training and certifications, as well as the proper engineering controls for containing abatement work zones and preventing asbestos or lead from migrating out of the isolated work areas.

The CIH oversees all aspects of the hazardous material removal. During all asbestos and lead abatement activities, industrial hygienists (IH) are on site full time, to provide quality control inspection and ensure compliance with the approved work plan.

The IH will also conduct air monitoring. Ambient air samples are analyzed prior to the start of abatement activities. During the abatement activities, continuous air monitoring is conducted at areas outside of the contained work zones. Upon completion of the abatement, the IH will conduct a final air sample to ensure air concentrations meet clearance criteria.

The CIH will sign and issue a letter to the Lafayette building manager with air clearance results.

Q15. What testing of Ex-Im Bank employees can be provided if employees feel they have been exposed to Asbestos?

A15. GSA does not test people for exposure. Instead, GSA investigates to determine if exposure has occurred and provides that information so affected parties can take action.

If anyone in the building feels that they have been exposed to suspicious materials, immediately alert your supervisor and the GSA Building Manager, and email your alert to: lafayette.modernization@gsa.gov.

Do not attempt to clean up the suspicious materials yourself. If the material is hazardous, touching it, making it airborne or transporting it on your clothing will make matters worse. GSA will come to evaluate the situation, secure the area, test the material and review the monitoring devices for evidence of exposure. The material will be cleaned up in accordance with Public Health Service protocols, and Ex-Im Bank will be informed throughout the testing and clean-up process.

Q16. What is meant by exhausting air out of containment or out of building?

A16. Each containment is required to have a calculated number of air filtration devices equipped with three stages of filters; including a High Efficiency Particulate Air (HEPA) filter. The purpose of these devices is to create a negative air flow so that air outside the containment is at a higher pressure than air inside. This device then filters the air within the containment and exhausts it outside of the building through flexible duct tubing.

Q17. Explain how the air systems are being separated between the lower and upper floors?

A17. GSA standard guidelines for asbestos abatement include the separation of the work areas from occupied spaces, essentially creating a containment that would prevent air from migrating and mixing with occupied spaces. Whenever asbestos abatement is underway during the Lafayette Modernization, full abatement containment procedures will be utilized to isolate the abatement area, including any associated air distribution systems.

A. Initial Construction Phase - (Phase 1a - November 2010 – September 2011): There are two areas that will require asbestos and lead abatement. Both areas have air systems that are not connected to the rest of the Lafayette building.

1. **First floor retail** - The air ventilation for the first floor retail space is dedicated to the retail space. This system is completely separate from the rest of the building's heating and ventilation systems.
2. **Penthouse level Network Operating Center** –The penthouse is not served by the ventilation system.

B. Interim Construction Phase - (Phase 1b - July 2011 – January 2012): Minor construction activities will take place on floors 1-6. When we prepare the floors 1-6 for Ex-Im Bank swing space, any abatement will take place during off hours within sealed containments. Within the containments, air is filtered before being exhausted outside the building. Additional air separation on floors 1-6 will consist of sealing off air vents and supply openings, ensuring that construction debris/dust is not mixed into air systems serving the occupied floors. During construction phase 1b, air recirculated from the construction areas through the basement air handlers will be filtered to eliminate dust and particulates before reaching the occupied floors 6 - 9.

C. Major Construction phase - (Phase 1c - March 2012-March 2014): During later construction phases when Ex-Im Bank moves downstairs into swing space, the air system for the upper floors will be blocked from the lower floors. Construction will occur on floors 8-12 while Ex-Im Bank is occupying floors 1-6, and throughout this phase, the air systems serving the occupied floors will be completely separated from the construction work zones. The 7th floor will not be occupied during construction, providing a "buffer" floor between occupied floors and floors in construction. After Ex-Im Bank moves back upstairs, the air system for the basement - 7th floors will be replaced

Q18. What is the process for notifying tenants of asbestos mishaps, such as breaches in the containment?

A18. The on-site Industrial Hygienist (IH), *Applied Environmental*, will immediately notify the abatement contractor, *LVI Services*, to cease work activity and make all necessary repairs. Simultaneously, Applied Environmental will notify the General Contractor, *Grunley*, and the GSA Project Manager. If the breach is serious enough for the IH to require building evacuation until the building is made safe again, the IH will notify the Building Manager who will immediately phone, text and/or email the tenants' points of contact (Agency Representatives). A full description of the breach protocol, which is part of the General Contractor's contract, is attached.

Abatement work will occur after normal working hours, so the building would not be occupied. If the breach was serious enough to require delaying the building opening the next working day, emails and/or phone calls will go out to all building occupants from the Building Manager and from the Agency Representatives for each agency, alerting everyone that the building would be closed,

and when it would be expected to reopen. More complete information about the incident will be posted on the project website.

Q19. What notifications are in place to reach the disabled in case of emergencies for abatement?

A19. Anyone who cannot be reached by email or building PA system alerts will be reached in person, when safety personnel implement the standard fire sweep procedure that verifies all building areas have been evacuated.

LEAVING LAFAYETTE

Q20. Why did Ex-Im Bank decide to stay in the Lafayette building during renovations?

A20. Since both Ex-Im Bank and VA wanted to keep a presence in the Lafayette Building, the project was designed for partial occupation during construction. DC Landlords will not generally provide leases with terms shorter than 5 years; and a 2-phase renovation takes 5 years to complete.

Currently, VA occupies 53% of space in the Lafayette building while Ex-Im Bank occupies about 38%. If Ex-Im Bank moved out, VA would not fit into the swing space Ex-Im Bank vacated. VA chose to leave because this project created an opportunity for VA to acquire more space to accommodate the Board of Veterans Appeals' recent growth. Also, VA was able to fund those initial move costs not covered by ARRA.

Financial considerations for Ex-Im Bank include the move costs, future tenant improvements and higher rent. Approximately $10 million is needed to move an agency the size of Ex-Im Bank to leased space. The tenant improvements can run $100+/square foot, or about $20-25 million in Ex-Im Bank's case. Ex-Im Bank would spend $30-$35 million to swing out, plus a similar amount to swing back in 5 years. If Ex-Im Bank leaves the Lafayette Building during the renovation, it is unlikely that Ex-Im Bank would be able to move back to Lafayette once the renovation was completed.

Ex-Im Bank could leave Lafayette permanently for leased space and avoid the move back costs. Lease procurements must be competed, so there is no guarantee that Ex-Im Bank would relocate to an area as centrally located and close to Metro as the Lafayette Building. For new leased space, unless Ex-Im Bank moved to a very low rent area, Ex-Im Bank's lease rent payments would be 2 or 3 times as much as rent in Lafayette.

Lastly, Phase 1 of the Lafayette project is scheduled to complete in March 2014. By law the ARRA funds must be spent by the end of FY15, so this allows enough time to finish the project before the funds sunset. It would take 18 – 24 months to procure leased space, design and build the tenant improvements, furnish and equip it, and move in. Delaying the Phase 1 completion into FY16 by 18 – 24 months would mean there would be no funding to pay for the project's last months.

APPENDIX A: GLOSSARY OF TERMS

Abatement: The act or state of abating or the state of being abated; reduction; decrease; alleviation; mitigation. Hazardous materials that are abated are safely removed.

Asbestos: A general name for a group of naturally-occurring minerals composed of small fibers. It is common in many building materials. Various diseases have been associated with industrial exposure to asbestos fibers, and the extensive use of asbestos in building materials has raised some concern about exposure in non-industrial settings. The presence of asbestos in a building does not mean that the health of building occupants is endangered. As long as asbestos-containing materials remain in good condition and are not disturbed or damaged, exposure is unlikely.

CATEX: A Categorical Exclusion: Categories of actions that have been determined not to have a significant effect on the human environment either individually or cumulatively. In its regulations for the implementation of National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) directed all Federal Agencies to adopt procedures which include identifying actions that are categorically excluded, i.e., normally do not require the preparation of either an environmental impact statement or an environmental assessment.

Certified Industrial Hygienist: Often referred to as a CIH and has a minimum level of education (a bachelors degree in science or engineering – or greater), a minimum of 4 years of experience as a full time practitioner in industrial hygiene, a minimum amount of specific formal education in industrial hygiene subjects, and passing a very rigorous national exam. A Certified Industrial Hygienist (CIH) should be knowledgeable in all aspects of protection of the health of workers and the general public. The independent group that certifies Industrial Hygienists is the American Board of Industrial Hygiene.

Containment: A sealed work space or chamber, under negative pressure so no hazardous materials can escape the sealed area.

EIS: Environmental Impact Statement: Under United States environmental law, EIS is a document required by the National Environmental Policy Act (NEPA) for certain actions "significantly affecting the quality of the human environment." [1] An EIS is a tool for decision making. It describes the positive and negative environmental effects of a proposed action, and it usually also lists one or more alternative actions that may be chosen instead of the action described in the EIS.

HEPA Filter: A high efficiency particulate air, or HEPA filter, is a type of air filter that satisfies certain standards of efficiency such as those set by the United States Department of Energy (DOE). HEPA filters are composed of a mat of randomly arranged fibers. The fibers are typically composed of fiberglass and possess diameters between 0.5 and 2.0 micrometer. Unlike membrane filters, where particles as wide as the largest opening or distance between fibers cannot pass in between them at all, HEPA filters are designed to target much smaller pollutants and particles.

IAQ: Indoor Air Quality: A term referring to the air quality within and around buildings and structures, especially as it relates to the health and comfort of building occupants.

Industrial Hygienist (IH): A competent, qualified individual educated in engineering and chemistry, whose job it is to protect the health of workers and the general public. Through education and experience an Industrial Hygienist has the ability to recognize health hazards, test the environment for those hazards, determine if there is a risk to human health in a particular situation, and recommend and inspect controls or means of protection from the recognized health hazard. The IH works under the direct supervision of a CIH.

Volatile Organic Compounds (VOCS): Refers to organic chemical compounds which have significant vapor pressures and which can affect the environment and human health. VOCs are numerous, varied, and ubiquitous. Although VOCs include both man-made and naturally occurring chemical compounds, it is the anthropogenic VOCs that are regulated, especially for indoors where concentrations can be highest. VOCs are typically not acutely toxic but can have chronic effects. VOCs are chemical components in products. Examples include paint, perfumes and cologne, cleaning solvents, off-gassing from systems furniture, etc.

APPENDIX B: ASBESTOS AND LEAD MONITORING PROCESS

A. Prior to work start up of abatement:

- Hazardous Materials Assessment (completed)
- Baseline fiber-in-air samples
- Pre-abatement checklist for inspection

B. During removal of hazardous materials:

- Daily checklist and notes documenting work activities
- Daily fiber-in-air samples

C. Post Abatement:

- Final checklist and notes documenting cleaning of containment
- Final fiber-in-air samples

CONSTRUCTION AIR QUALITY MONITORING for VOC's and RESPIRABLE PARTICULATE

A. Prior to construction work start:

- Baseline air quality (completed)

B. During construction work activity:

- Daily air quality monitoring

C. Post construction:

- Pre-occupancy air quality